



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

January 11, 2021

BY ECF

Honorable Gregory H. Woods
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Edward Shin,
19 Cr. 552 (GHW)

Dear Judge Woods:

The Government writes respectfully in response to the Court's order, dated January 6, 2021, granting the defendant Edward Shin's request to adjourn the trial date. In the order, the Court asked the parties to propose a list of trial dates in the late summer and early fall of 2021.

The Government has conferred with the defense counsel but the parties have been unable to arrive at a joint proposal. The Government continues to request that trial in the above-captioned matter be scheduled as soon as practicable, and so the Government proposes that trial begin July 19 or July 26. The Government understands that defense counsel has a personal conflict beginning on or about August 10; the proposed trial dates of July 19 or July 26 are intended to accommodate that conflict.¹ Given the trend last year of decreased coronavirus cases in the District during the summer, as well as current news reports regarding vaccination plans, it is reasonable to expect that a trial scheduled for the end of July would be able to take place safely.

In the event that July 19 or July 26 is unavailable as a trial date for the Court, the Government requests the first date available thereafter, including August 2 or August 9.

Respectfully submitted,

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By: /s/
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¹ These proposed trial dates are also consistent with defense counsel's previous request for a trial date in "early summer of 2021." (See Dkt. No. 51.)